

Appl. No. : 09/731,474  
Filed : December 6, 2000

#### REMARKS

Applicant has the following comments in response to the above-office action.

##### Discussion of Claim Status

In the Office Action, the Examiner rejected Claims 1-4, 13, 14, and 24-48. Claims 5-12 and 15-23 are allowed.

##### Discussion of Claim Rejections Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected Claims 1-4, and 13, 14, and 24-48 as being unpatentable in view of U.S. Patent No. 6,269,484, to Simsic, et al. (hereinafter "Simsic") in view of U.S. Patent No. 6,178,205, to Cheung, et al. (hereinafter "Cheung"). Applicant respectfully disagrees with these rejections.

One embodiment of the invention is directed to a filter for filtering compression artifacts from a decoded video sequence. These artifacts can result from the coarse quantization of a prediction error signal. In one embodiment, the strength of a filter that is applied to the compression defects is set as a function of detected motion activity within the video sequence. Applicant respectfully submits that Simsic and Cheung fail to teach or suggest varying a filter strength as a function of the detected motion activity as is presently claimed.

##### Claims 1, 13, 14, 29, 33, 37, 41, and 45

Independent Claim 1, as amended recites "a filter module coupled to the video decoder and the output and configured to filter compression artifacts from a decoded video sequence received from the video decoder, the filter module having a variable filter strength that is a function of detected motion activity within the video sequence." Independent Claims 13, 14, 29, 33, 37, 41, and 45 include similar types of recitations. To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. See M.P.E.P. § 2143.03. Applicant respectfully submits that Simsic and Cheung do not expressly teach or suggest at least the above recitations, and therefore the present claims are patentable over Simsic.

Simsic is directed to an apparatus for filtering interlaced signals for presentation on a non-interlaced display device. Interlaced display devices, such as television display devices typically display images using even and odd line interlacing. See Simsic, col. 1, lines 18-20. The

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interlaced video consists of one field of even line data and one field of odd line data, each field being displayed 30 times per second resulting in a complete frame being displayed 30 times a second. See col. 1, lines 21-24. When an interlaced signal is sent to a for display on a non-interlaced device, the non-interlaced device needs to "deinterlace" the signal so as to be able to display a complete frame 60 times per second. See col. 1, line 24-26. During the deinterlacing process, certain edges in the non-interlaced signal need to be filtered. See col. 2, lines 45 and 46.

Thus, in contrast to filtering to remove compression artifacts, the focus of the filtering performed in Simsic is to blend adjacent odd and even lines. Simsic does not teach or suggest the need or how to remove artifacts that are due to compression of the video sequence. Compression artifacts can result from the coarse quantization of a prediction error signal. Filtering to remove artifacts caused by deinterlacing does not remove artifacts that originate as a result of video compression.

Furthermore, Simsic fails to teach or suggest providing a filter strength that is a function of detected motion activity within the video sequence. In the Office Action, the Examiner acknowledged this fact and took the position that this was disclosed by Cheung. The Examiner stated:

Cheung et al disclose a video post filtering with motion compensated temporal filtering and/or spatial adaptive filtering comprising; a filter module having a variable filter strength that is a function of detected motion activity within the video sequence (column 3, lines 40-61).

See Office Action, p. 3. Applicant submits that although Cheung discloses an adaptive filter, it does not vary the filter strength as a function of detected motion activity. Cheung describes a filtering technique that uses motion vector information of the provided frames to determine which reference pixels should be used in a filter with respect to a target pixel. However, Cheung does not analyze motion within the frame to determine the strength of the filter once a reference pixel has been identified.

For example, Equation 3 of Cheung, shows the way Cheung filters a pixel value  $P_{ij}$  for a current frame and a reference value  $R_{ij}$  to generate an output pixel value  $O_{ij}$ . Equation 3 states  $O_{ij} = P_{ij} - F(P_{ij}-R_{ij})$ . See col. 7, line 22. Filter Function  $F(P_{ij}-R_{ij})$  is a function of a difference  $\Delta$  between decoded pixel value  $P_{ij}$  and the associated reference value  $R_{ij}$ . The filter function may

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depend on coding parameters such as the macroblock quantization step size. See col. 7, lines 28-30. Table 2 of Cheung illustrates an exemplary filter function. See col. 7, lines 31 and 32. Thus, in Cheung, the filter strength is based upon the difference in energy between the target pixel and the reference pixel and the macroblock quantization step size. Applicant respectfully submits that this is not based upon the detected motion in the video sequence. Applicant notes that Cheung discloses another embodiment that sets the filter strength based upon detected edges in the frame. See col. 9, line 37 – col. 10, line 46. However, Applicant again submits that this is not based upon detected motion with the video frame.

Since Simsic and Cheung does not teach or suggest varying a filter strength based upon detected motion with a video sequence, Applicant respectfully submits that independent Claims 1, 13, 14, 29, 33, 37, 41, and 45 are in condition for allowance.

Claims 2-4 and 24-44

Since Claims 2-4 and 24-28, 30-32, 34-46, 38-40, 42-45, 47 and 48 each depend on one of Claims 1, 13, 14, 29, 33, 37, 41, and 46 Applicant respectfully submits that these claims are allowable for at least the reasons discussed above and the subject matter of their own recitations.

Summary

Applicant has endeavored to address all of the Examiner's concerns as expressed in the outstanding Office Action. In light of the above remarks, reconsideration and withdrawal of the outstanding rejections is specifically requested. If the Examiner has any questions that may be answered by telephone, he is invited to call the undersigned directly.

Respectfully submitted,

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